

# **Exhibit 52**

Transcript of the Testimony of  
**Ray Perryman**

**Date:**

June 27, 2018

**Case:**

STATE OF TEXAS vs UNITED STATES of AMERICA

Ray Perryman

June 27, 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, )  
Plaintiffs, ) Case No.  
vs. ) 1:18-cv-00068  
UNITED STATES OF AMERICA, et al., )  
Defendants, )  
and )  
KARLA PEREZ, et al., )  
Defendant-Intervenors. )

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ORAL DEPOSITION OF  
RAY PERRYMAN

Wednesday, June 27, 2018  
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Oral deposition of RAY PERRYMAN, produced as  
a witness at the instance of the Plaintiff States, and  
duly sworn, was taken in the above-styled and numbered  
cause on the 27th day of June, 2018, from 2:00 p.m. to  
4:44 p.m., before Deborah L. Endler, Notary Public in  
and for the State of Texas, reported by stenographic  
means, at the offices of the Attorney General, 300  
West 15th Street, 11th Floor, Austin, Texas 78701,

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1 pursuant to the Federal Rules of Civil Procedure and  
2 the provisions stated on the record or attached  
3 hereto.  
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1 anyone who exists in a state, we contribute something  
2 and we make use of the water systems and the sewer  
3 systems and highways and potentially school districts  
4 and we pay revenue into the system as well. So it's a  
5 case of balancing those things against one another.

6 Q. And that's what you tried to do, in part,  
7 in your Declaration?

8 MR. HERRERA: Objection, vague.

9 A. Yes, sir. Well, actually, I'm sorry, in  
10 prior work we've done that I incorporate in the  
11 Declaration, that's correct.

12 Q. Okay. So fair to say in your opinion the  
13 State of Texas benefits, to some degree, from the DACA  
14 program?

15 A. On a net basis, yes, sir.

16 Q. And then if we go to below the net, net  
17 means you took out the benefits, you took out the  
18 costs and the benefits; right?

19 A. That's correct.

20 Q. So in that equation the State of Texas  
21 realizes some benefit from DACA?

22 A. That's correct.

23 Q. And the State of Texas realizes some costs  
24 from DACA?

25 A. Correct.

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1 currently in school?" Do you see that?

2 A. Yes.

3 Q. And the "yes" response is 44.9 percent?

4 A. Yes.

5 Q. And do you think that's where you got the  
6 45 percent cited in paragraph 19 in your Declaration?

7 A. Yes.

8 Q. Okay, great. So then if we go to the next  
9 page, we see "What degree are you currently pursuing"?  
10 Do you see that?

11 A. Yes, sir.

12 Q. Then we have 2.7 percent getting their high  
13 school diploma. Do you see that?

14 A. Yes, sir.

15 Q. Based on that, do you think that some  
16 portion of DACA recipients are currently in high  
17 school?

18 A. I would think so. The age would suggest  
19 that.

20 Q. Right. All right. If we turn to the page  
21 of your Declaration, I'm sorry, the sentence begins on  
22 page 7. It says "Overall, 36 percent of respondents  
23 25 years or older have at least a bachelor's degree  
24 and 94 percent of those currently in school indicated  
25 that DACA allowed them to pursue educational

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1 lot of females entered the workforce who had  
2 historically had not been there, that's also  
3 plateaued, starting to fall off a little bit now.

4 So a phenomenon that existed for a couple  
5 decades has now reached its peak and start going the  
6 other direction. So that's something that can effect  
7 it.

8 There is any number of situations that can  
9 affect why a person chooses to participate or not  
10 participate in a workforce.

11 Q. If median wages go up, does that affect --

12 A. It can.

13 Q. How would it affect that?

14 A. If you have a situation of higher wages,  
15 that may well encourage some people to choose to enter  
16 the workforce.

17 Q. Okay. What about the number of job  
18 openings, can that affect the labor force  
19 participation?

20 A. It can, absolutely.

21 Q. How would that happen?

22 A. Well, if you, where you normally see this  
23 where you have a recession sometimes, people will get  
24 discouraged about the number of job openings or the  
25 ability to find a job, and may, after searching for a

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1 A. One more. I'm with you.

2 Q. In paragraph 31 you talk about the labor  
3 shortage and then the third sentence says "Some  
4 companies have increased wages to attract more  
5 qualified applicants."

6 Why would a company increase wages to  
7 attract more qualified applicants?

8 A. Because they have a need for workers and  
9 there is not, there is not workers available.

10 We have an interesting situation right now  
11 we've never had in history before, since we have been  
12 keeping data on some of these statistics, and that is  
13 that we have a lot more job openings even in total  
14 number of unemployed people. So it's a really, it's a  
15 very interesting phenomenon in the workforce right now  
16 that we haven't seen before. And a lot of areas where  
17 there is workforce shortages, that's one way you try  
18 to induce people to work, either to come into the  
19 workforce or to change jobs.

20 Q. Yeah, okay. So if I can just summarize  
21 that in my head to make it make sense to me, so if  
22 there is a labor shortage, that can potentially  
23 increase wages?

24 A. Certainly.

25 Q. Okay. So if there is, let me say it a

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1 I've done a lot of work over the years in the area of  
2 hunger and the food banks, food pantries, that sort of  
3 thing, that provide that service to people  
4 irrespective of immigration status, do get some  
5 support from the state, so that might be one example.

6 Q. Okay. Anything else you can think of?

7 A. I'm sure there are others. That's one that  
8 comes to mind.

9 Q. What about law enforcement? How does the  
10 state incur a cost providing law enforcement services  
11 related to undocumented workers?

12 MR. HERRERA: Objection, vague.

13 A. Well, generally we all benefit from the  
14 availability. If you are in an area, you benefit from  
15 the availability of law enforcement. But more  
16 specifically, like any large group of people you  
17 probably going to have some of these folks do some  
18 things they shouldn't do and end up in the law  
19 enforcement system which involves potentially court  
20 costs, prosecutorial costs, costs of incarcerating  
21 people, things of that nature.

22 Q. On this sentence on page 17 when you say  
23 "costs involved with undocumented workers," as we  
24 talked about earlier, that phrase "undocumented  
25 workers" includes the DACA population?

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1           A.       Again, it more than likely does because as  
2 I understand it that's technically how they are still  
3 classified.

4           Q.       Okay. Let's move on. Go to page 19,  
5 please.

6           A.       Yes, sir.

7           Q.       The bottom paragraph on that page.

8           A.       Yes, sir.

9           Q.       So, again, just to reiterate, you say  
10 "There are costs associated with the undocumented  
11 population which accrue to governmental entities such  
12 as education, social services and health care." You  
13 still agree with that statement?

14          A.       Yes, sir.

15          Q.       And when you say undocumented population,  
16 that includes DACA recipients?

17          A.       I believe it would, yes.

18          Q.       And then you say "The Perryman Group  
19 measured these costs based on the best available  
20 information from various sources." When I read that,  
21 to me that sounds like it's an estimate; is that fair  
22 to say?

23          A.       Well, certainly. We don't know exactly a  
24 lot of these. There is not exact measures of  
25 anything. We don't know the exact amount.

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1 break it down then. Do you know how you calculated  
2 the \$3 billion estimated expense to the federal  
3 government caused by the undocumented population?

4 A. Not without working back through all the  
5 information from the time. I'm sorry.

6 Q. What about the \$3.1 billion to the State of  
7 Texas?

8 A. I would have to give the same answer there.

9 Q. And same for the \$6.7 billion for local  
10 entities?

11 A. Yes.

12 Q. So this \$3.1 billion to the State of Texas  
13 is the cost you estimated Texas incurred because of  
14 its provision of services to the undocumented  
15 population in Texas?

16 A. Correct.

17 Q. And that undocumented population included  
18 the DACA population?

19 A. I believe it would have, yes.

20 Q. All right.

21 A. As they are a percentage of it, and I would  
22 have to probably use fewer services, but yes.

23 Q. All right. And you said fewer services but  
24 you are not saying that the DACA population used none  
25 of these services?

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1           A.     I would not think so. I can almost  
2 guarantee they used water and sewer.

3           Q.     And health care and education?

4           A.     Right.

5           Q.     Okay. If you flip to page 21, please.

6           A.     Yes, sir.

7           Q.     Will you just give me an explanation of  
8 what this chart calculates?

9           A.     Certainly. It looks at the direct and  
10 indirect benefits broken out by state and local  
11 governments, I'm sorry, federal, state and local  
12 governments in Texas and then subtracts from those the  
13 cost for those items referred to.

14          Q.     Okay, so the first three rows are benefits?

15          A.     Correct. Correct, yes, the third row is  
16 just the sum of the first two.

17          Q.     I see. And then the last row is the cost?

18          A.     Correct.

19          Q.     So and then if we look at the total net  
20 effect, total, it's 32.9 billion?

21          A.     Correct.

22          Q.     And what did you do with that 32.9 billion?

23          A.     It's just one of the numbers we report in  
24 the report.

25          Q.     Fair enough. But if we look back at page 3

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1 it, but I think it was fine.

2 Q. Now let's look at paragraph 39. In here  
3 you are talking about the benefits to the United  
4 States and Texas because of the business activity  
5 associated with DACA recipients?

6 A. Correct.

7 Q. Now, how did you calculate those benefits?

8 A. The process was very similar to the one in  
9 the report that you and I just went through at some  
10 length. Basically we took that same basic model and  
11 made some adjustments to it. One adjustment was it  
12 was a couple years later so we had to do some price  
13 adjustments.

14 But beyond that, we looked at the relative  
15 wages of the DACA population versus the non-DACA and  
16 made some of those type of adjustments. But the  
17 modeling structure process was the same as the one  
18 that we used in the study that you referenced earlier.

19 (Deposition Exhibit 8 was marked.)

20 Q. All right, I'm going to show you Exhibit 8.  
21 This is from the production your counsel made to us --

22 A. Yes, sir.

23 Q. -- regarding your work file.

24 A. Yes, sir.

25 Q. These are the numbers that are ultimately

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1 reflected in paragraph 39?

2 A. Yes, sir.

3 Q. And what is this document that I've marked  
4 as Exhibit 8?

5 A. It's just a document that my firm generated  
6 from our programs that gave the, all the numbers, code  
7 numbers.

8 Q. And when I look at Exhibit 8, I see that,  
9 and I compare Exhibit 8 to paragraph 39, if we just  
10 look at the Texas specific portion, sentence in  
11 paragraph 39 begins "For Texas, the direct gains in  
12 business activity associated with DACA recipients  
13 include an estimated \$11.5 billion in output" and that  
14 comes from the gross product Texas direct --

15 A. That's correct.

16 Q. -- in Exhibit 8?

17 A. (Witness nodded.)

18 Q. And then "\$7.2 billion in income each  
19 year," and that also comes from Exhibit 8, the  
20 personal income number?

21 A. Yes, sir.

22 Q. For Texas direct. "In addition to more  
23 than 108,100 thousand jobs."

24 A. Yes.

25 Q. And that also comes from Exhibit 8?

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1 A. Yes, sir.

2 Q. Okay. So that's talking about the direct  
3 benefits; right?

4 A. Correct.

5 Q. And then if we look on Exhibit 8, we see  
6 the total benefits for Texas, and I assume that's the  
7 multiplied benefits?

8 A. Multiplied benefits.

9 Q. Okay.

10 A. And they are all nets as well.

11 Q. How do we know that they are nets?

12 A. Because that's how I set up the system.  
13 It's exactly the same modeling structure that was used  
14 in the prior report.

15 Q. Okay. So when you set up the system, it  
16 did, in fact, calculate the projected costs incurred  
17 by Texas because of DACA recipients in the state?

18 A. Yes.

19 Q. Is that information that you can provide to  
20 your counsel?

21 A. By cost, you're talking about the net cost  
22 and benefits to the government as opposed to the --

23 Q. Yes, sir. So, for example, if we look at  
24 Exhibit 3 --

25 A. Yes.

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1 Q. -- which is a similar study you did for  
2 undocumented workers generally; right?

3 A. Yes, sir.

4 Q. And on page 20 you have estimated the costs  
5 of those undocumented workers to the State of Texas,  
6 for example?

7 A. Yes, sir.

8 Q. You did that same estimating for DACA  
9 specific recipients; right?

10 A. I used the same program, so should be able  
11 to go back and extract it.

12 Q. Okay.

13 A. The only other thing I could suggest, I  
14 think we also provided you with, we didn't do a full  
15 blown report on this, it was just for a seminar, but  
16 we did do a column about it. I think we provided you  
17 a copy of it. I would have to go back and extract it,  
18 but that could be done.

19 Q. I don't think that it does, but let's just  
20 make sure.

21 A. If it doesn't, then I would have to go back  
22 and extract it.

23 Q. I just want to make sure we're talking  
24 about the same thing.

25 (Deposition Exhibit 9 was marked.)

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1 A. Looks like it.

2 Q. I'm going to hand you Exhibit 9. Is this  
3 the article that you were just referencing?

4 A. It is, yes, sir.

5 Q. Okay. And when I read this article, I may  
6 have missed it, I didn't see anything about the costs  
7 that you estimated related to the DACA population.

8 A. It's not in there. I don't see it. So I  
9 obviously did not include it in this. So the number  
10 exists inside the program. I would have to go extract  
11 it, but that could be done.

12 MR. DISHER: Mr. Herrera, I would request  
13 that you produce that portion of Mr. Perryman's work  
14 product that directly relates to the opinions that  
15 he's offering in paragraph 39.

16 MR. HERRERA: Okay. I would, and this  
17 would be something we would discuss off the record.

18 MR. DISHER: That's fine.

19 MR. HERRERA: I think there may be some  
20 trade secret concerns here just because it's a model  
21 used. You are looking for just the inputs, correct?

22 MR. DISHER: I'm looking for the numbers  
23 that Dr. Perryman used to calculate the net benefits  
24 he is reporting in paragraph 39, and that would  
25 include the total benefits as well as the total costs,

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1 the two numbers that he then subtracted to come to the  
2 net benefits.

3 A. For the State of Texas; is that correct?

4 Q. And federally.

5 A. Restate. For governmental entities as  
6 opposed to the whole economy. For the federal, state  
7 and local governments as opposed -- these are the  
8 numbers for the entire economy.

9 Q. Okay.

10 A. Which you recall we looked at that 600  
11 something billion dollars for the economy and 39  
12 billion or something for public entities.

13 Q. Yes.

14 A. You are looking for the public entity  
15 number, is that correct?

16 Q. I'm looking for both. The public entity  
17 numbers and the total numbers.

18 A. Okay. I think it was programmed to do the  
19 net numbers to begin with on these total impacts which  
20 is exactly the same as what's in that report.

21 Q. Okay.

22 A. So --

23 Q. Whatever level of detail you can provide.

24 A. Okay.

25 Q. As detailed as your software will allow you

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1 to do in terms of the cost estimations you used in  
2 forming the numbers that are reported in paragraph 39.  
3 As well as if you have any information related to the  
4 specific costs incurred by the governmental entities  
5 like on page 20 of Exhibit 3.

6 A. Okay. Assuming you guys say that's okay,  
7 lawyer stuff.

8 Q. Do you remember, as you are sitting here  
9 today, and I'm not trying to, I'm just trying to ask  
10 you do you remember today can you give me an estimate  
11 about what the costs were that you estimated related  
12 to the DACA recipients?

13 A. No, I can't in all honesty because that  
14 wasn't the focus in this instance. Unlike the prior  
15 one they were releasing a report. This is literally  
16 just a one night seminar and they asked me to do  
17 economic benefits, and I used the same model and  
18 updated everything and applied the DACA data to it.  
19 And I don't think I ever looked at that.

20 Q. Okay. Do you know would it have been in  
21 the millions of dollars?

22 A. Again, I'll have to look at it. I don't  
23 want to sit here and give you numbers off the top of  
24 my head.

25 Q. I'm just asking you to estimate.

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1           A.       I would hesitate to do that in the absence  
2 of looking at the numbers. But I believe I can get  
3 you what you are asking for from the program.

4           Q.       Okay.

5           A.       I believe I can get you the same level as  
6 that report.

7           Q.       That would be fantastic. Thank you.

8           Do you remember those costs that you were  
9 trying to estimate, were those for the same types of  
10 services that are reported in Exhibit 3?

11          A.       They would be, yes.

12          Q.       So that would be health care, for example?

13          A.       Health care.

14          Q.       Education?

15          A.       Education.

16          Q.       Law enforcement?

17          A.       Law enforcement, social services.

18          Q.       And those would be costs incurred in part  
19 by the state because of DACA recipients?

20          A.       Right, that's correct.

21          Q.       And you don't dispute that those costs  
22 exist; right?

23                   MR. HERRERA: Objection, asked and  
24 answered, several times.

25          A.       I don't dispute that, I use the analogy in

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1 the report somewhere, for example, you're making a  
2 car, you're making a profit on the car, you have to  
3 buy wiper blades, I don't dispute the wiper blades  
4 cost money, but you make money on the car. I don't  
5 dispute that there's cost and benefits, and the  
6 benefits outweigh the costs. I don't dispute that.

7 Q. But you don't dispute that there is a cost  
8 associated with DACA recipients borne by the State of  
9 Texas?

10 MR. HERRERA: Objection, asked and  
11 answered.

12 A. Subject to everything I said before  
13 obviously by the last answer.

14 Q. All right. One of those costs borne by the  
15 State of Texas because they're DACA recipients that  
16 you have estimated relates to education to the DACA  
17 recipients through Texas public school program?

18 MR. HERRERA: Objection, asked and  
19 answered.

20 A. Yeah, that's one thing I would have to add  
21 about that is, as I understand it, the schools have to  
22 provide education to the undocumented population. I  
23 don't think it's really an issue whether or not they  
24 are in DACA or not.

25 In other words, if you took DACA away, and

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1 they all stayed, I don't think the number would  
2 change. But clearly to the extent people are  
3 classified as DACA, persons who are in the high school  
4 at this point in time, their education is being  
5 funded. But it's not because they are in DACA, it's  
6 because they are here.

7 Q. And is being funded in part by the State of  
8 Texas?

9 A. Correct, yes.

10 Q. And I jumped ahead of myself there. I  
11 meant to ask you about health care.

12 A. Okay.

13 Q. But same question as a lead-in, you don't  
14 dispute that the State of Texas does indeed incur a  
15 cost to provide health care to DACA recipients?

16 MR. HERRERA: Objection, asked and  
17 answered.

18 A. Again, the only clarification I would give  
19 is, again, for the undocumented population, since they  
20 use it, a little bit less for the DACA based  
21 population, but nonetheless I assume there would be  
22 some people in the DACA population who are likely to  
23 have some type of care that is reimbursed in some way  
24 by the state.

25 Q. And those types of care would be things

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1 nature set up, that you do tend to have, a lot of  
2 costs are associated with the actual operation of the  
3 facility, that there is a lot of things, costs  
4 associated with it. But I have not independently  
5 evaluated these specific facilities.

6 Q. All right. Paragraph 49 says it begins  
7 even if these were -- Start that over.

8 Paragraph 49 begins "Even if they were not  
9 based on unreliable methodology, these estimates are  
10 actually quite low." Do you see that?

11 A. Yes sir.

12 Q. What methodology do you propose that HHSC  
13 should have used to come up with these estimates?

14 A. Well, I don't have a specific methodology  
15 in mind because I didn't set out to do the analysis.  
16 I wasn't sponsoring evidence of that nature. I was  
17 simply responding to what Ms. Smoot did.

18 I feel quite certain that I could come up  
19 with some methodology if that were part of my assigned  
20 task. For example, in the reports we did come up with  
21 the estimates of cost, direct costs to the state.

22 Q. That's my next question.

23 A. Okay.

24 Q. Even though you may have criticisms about  
25 the specific methodology you used, you don't disagree

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1 that the state does incur some cost to provide these  
2 services to DACA recipients?

3 A. Well, certainly the analysis I've done  
4 today suggests that there are some costs. Not on a  
5 net basis but just talking about the windshield wiper  
6 not the car, there are some costs associated there  
7 with undocumented immigrants in general. I haven't  
8 analyzed the DACA population specifically, but with a  
9 population that size there is some probability that  
10 there is.

11 Q. All right. Okay. If you go to page 19,  
12 please.

13 A. Yes, sir.

14 Q. If we look at paragraph 51?

15 A. Yes, sir.

16 Q. The second sentence begins "As mentioned  
17 above, in a 2017 survey of DACA recipients -- "

18 A. Yes, sir.

19 Q. -- and then the cite to that again is  
20 Dr. Wong's study; right?

21 A. That's correct.

22 Q. And so the rest of those numbers in that  
23 paragraph all come from Dr. Wong's study; right?

24 A. I believe so. There is also, looks like  
25 some updated numbers, also, yes.

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1 into this case?

2 A. Quite a few. I don't know, because  
3 obviously going to take more time than what I had  
4 agreed to. I didn't continue to track it, so I won't  
5 be billing any time for the associates.

6 Q. Understood. Just your time.

7 A. I'll just be billing the capped amount for  
8 both pieces.

9 Q. Is \$800 an hour the normal rate that you  
10 charge?

11 A. It is, yes, sir.

12 Q. How many years have you been charging \$800?

13 A. Seems like we raised it three years ago,  
14 something like that. Somewhere along those lines. It  
15 was 750 before that.

16 Q. Do you have any estimate about total amount  
17 of money that you have made as an expert witness for a  
18 party in litigation over the course of 40 years?

19 A. No, sir, I don't.

20 Q. Over a million dollars?

21 A. Absolutely.

22 Q. 3 million?

23 A. Absolutely.

24 Q. 5 million?

25 A. Yes, sir.

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1 Q. 10 million?

2 A. Yes, sir. And let me be very clear about  
3 that when I say that, I'm talking about the amount  
4 that was billed for my time. I'm not talking about  
5 net. I'm talking about gross. But billed for my time  
6 over 40 years, absolutely, more than \$10 million.

7 Q. 20?

8 A. Yes, sir.

9 Q. 30?

10 A. Not sure.

11 Q. Okay. Somewhere between 20 and 40 maybe?

12 A. I have no idea. Without doing some work,  
13 you got me past my comfort level.

14 Q. All right. Fair enough. In the last,  
15 let's just say the last five years, what percentage of  
16 your time professional time is devoted to your work as  
17 an expert witness for a party in litigation?

18 A. Boy, that varies a lot from year to year.  
19 Rough estimate 35 or 40, maybe something like that.  
20 That's very rough. It could be plus or minus a little  
21 on each side.

22 Q. Okay. Your CV is extensive.

23 A. It is.

24 Q. It's about 450 pages or so?

25 A. Thereabouts. I don't keep it up.

Ray Perryman

June 27, 2018

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, )  
Plaintiffs, ) Case No.  
vs. ) 1:18-cv-00068  
UNITED STATES OF AMERICA, et al., )  
Defendants, )  
and )  
KARLA PEREZ, et al., )  
Defendant-Intervenors. )

REPORTER'S CERTIFICATION  
DEPOSITION OF RAY PERRYMAN  
June 27, 2018

I, Deborah Endler, Shorthand Reporter in and  
for the State of Texas, do hereby certify that the  
foregoing deposition is a full, true and correct  
transcript:

That the foregoing deposition of RAY  
PERRYMAN, the Witness, hereinbefore named was at the  
time named, taken by me in stenograph on June 27,  
2018, the said Witness having been by me first duly  
cautioned and sworn to tell the truth, the whole truth  
and nothing but the truth and the same were thereafter  
reduced to typewriting by me or under my direction.

( ) That by agreement of counsel, a reading  
condensed copy of the deposition transcript along with  
the full-sized original Changes and Signature Sheet  
has been sent to \_\_\_\_\_ on  
\_\_\_\_\_ for review and signature within 30 days

Ray Perryman

June 27, 2018  
Page 111

1 and if any corrections returned are attached hereto.

2 ( ) That the Witness shall have thirty (30)  
3 days for review and signature of the original  
4 transcript and if any corrections returned are  
5 attached hereto.

6 ( ) That the signed transcript ( ) was ( )  
7 was not received from the Witness within 30 days.

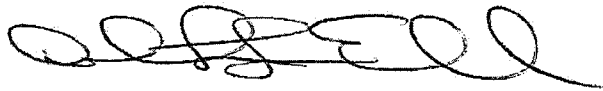
8 That the amount of time used by each party at  
9 the deposition is as follows:

10 Mr. Disher - 2 hours, 44 minutes

11 That before the completion of the deposition,  
12 the Deponent, and/or the Plaintiff/Defendant \_\_\_\_ did  
13 \_\_\_\_ did not request to review the transcript.

14 I further certify that I am neither counsel  
15 for, related to, nor employed by any of the parties or  
16 attorneys in this action in which this proceeding was  
17 taken, and further that I am not financially or  
18 otherwise interested in the outcome of the action.

19 WITNESS MY HAND, this the 28th day of June,  
20 2018.

21 

22 DEBORAH L. ENDLER, Reporter  
23 EXPIRATION DATE:  
24 Firm Registration No. 631  
25 Kim Tindall & Associates, LLC  
16414 San Pedro, Suite 900  
San Antonio, Texas 78232  
Phone 210-697-3400